

RENEWAL ENTERPRISE DISTRICT

CONFLICT OF INTEREST CODE

Adopted November 25, 2019

The Political Reform Act, Government Code section 81000, et seq., requires state and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission ("FPPC") has adopted a regulation, 2 California Code of Regulations 18730, which contains the terms of a standard Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the FPPC to conform to amendments in the Political Reform Act after public notice and hearings ("Standard Code"). Therefore, the terms of Standard Code and any amendments to it duly adopted by the FPPC are hereby incorporated by reference and, along with the attached Exhibit A in which officials and employees are designated and disclosure categories are set forth, constitutes the Conflict of Interest Code of the Renewal Enterprise District (RED).

Pursuant to subsection (b)(4) of the Standard Code, designated employees shall file the original of their statements of economic interest with the Clerk of the Board of Directors of the RED and retain copies for their personal records. The Clerk shall retain copies of all statements and forward the Board members' original statements to the Clerk of the Sonoma County Board of Supervisors.

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I. DESIGNATED POSITIONS

The following are designated positions within the Renewal Enterprise District ("RED") which involve or may involve the making of or participating in the making of decisions which may foreseeably have a material effect on any economic interest and the specific types of investments, and business positions in business entities and income from sources which manufacture, sell or provide, supplies, materials, books, machinery, services or equipment of the type utilized by the RED, interest in real property, and sources of income which are reportable.

Each Designated Position must disclose on appropriate FPPC forms filed with the Clerk of the RED Board the disclosure information required by their assigned Disclosure Category.

<u>Designated Position</u>	<u>Disclosure Category</u>
Board Member	1
Executive Director	1
General Counsel	1
Board Secretary	2
Consultant	*

II. DISCLOSURE CATEGORIES

A. *Disclosure Category 1*

All investments, business positions and sources of income, including gifts, loans and travel payments; all interests in real property. Only investments in and sources of income from business entities, and sources of income from businesses in the geographic area of the RED, or real property interests located in the RED, need to be reported.

B. *Disclosure Category 2*

All investments, business positions and income, including gifts, loans and travel payments, from sources that provide goods, equipment, vehicles, machinery or services, including training or consulting services, of the type utilized by the RED. Designated Positions in this category could possibly have a conflict due to an interest in a supplier of goods, materials, or services to the RED. Income and gifts from, and investments and business positions in, any business entity supplying such goods and services to the RED within the previous 12-month period are to be disclosed. Such disclosure shall only be necessary if the value of such goods or services provided to the RED, or the value of funds deposited by the RED in or with such business entity, exceeds the sum of \$5,000 during the previous 12-month period.

* Consultants shall be required to make all necessary disclosures under this Code prior to the award of any contract by the RED. The Executive Director's written determination granting a Consultant a variance

from the assigned Disclosure Category is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code.

III. VARIANCE FROM DISCLOSURE CATEGORY

Consultants shall be included in the list of designated employees and shall disclose pursuant to the broadest disclosure category in the Code subject to the following limitation:

The Executive Director may determine in writing that a particular Consultant is hired to perform a range of duties that is limited in scope and thus not required to fully comply with the disclosure requirements applicable to Disclosure Category 1. The Executive Director's written determination shall include a description of the Consultant's duties and a statement describing the extent of disclosures required of the Consultant that is based on the Consultant's duties.

IV. TRANSPARENCY

Pursuant to Government Code section 81008, the statements of economic interest shall be made available for public inspection and reproduction during the RED's regular business hours at its regular place of business.